

IN THE MATTER OF:	)	CHAPTER 11
	)	
ANDY'S TIRE SHOP INC.	)	JUDGE PAMELA HOLLIS
	)	
DEBTOR.	)	CASE NO. 09-14045

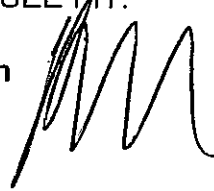
NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE that on June 24, 2010, at the hour of 10:30 a.m. or as soon thereafter as counsel may be heard, a hearing on the attached MOTION FOR ENTRY OF FINAL DECREE will be heard before the Honorable Pamela Hollis, Bankruptcy Judge at 219 S. Dearborn, Room 644, Chicago, Illinois, or before any other bankruptcy Judge sitting in his stead.

AT WHICH TIME AND PLACE YOU MAY APPEAR IF YOU SEE FIT.

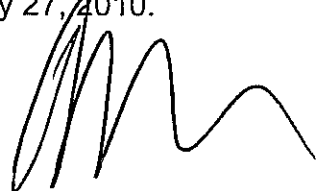
Law Offices of Paul M. Bach  
Paul M. Bach  
P.O. Box 1285  
Northbrook, IL 60065  
(847) 564-0808



CERTIFICATE OF SERVICE

I, Paul M. Bach, an attorney, on oath, certify that I served a copy of the above **Notice**, together with the attached **Motion and all Attachments**, by First Class US Mail postage prepaid on all parties on the attached service list on May 27, 2010.

/s/ Paul M. Bach



Service List

**ANDY'S TIRE SHOP INC.**

PO Box 34320  
Chicago, IL 60634

**United States Trustee**

219 S. Dearborn Street  
Chicago, Illinois 60604

**American Express Business Gold**  
Box 0001 (13808245)  
Los Angeles, CA 90096-0001 (cr)

**American Express Business Mangement**  
Box 0001 (13808246)  
Los Angeles, CA 90096-0001 (cr)

**Citi Business Card**  
P.O. Box 688917 (13808247)  
Des Moines, IA 50368-8917 (cr)

**Commercial Collections Inc.**  
P.O. Box 250957 (13808248)  
Milwaukee, WI 53225 (cr)

**Fifth Third Bank**  
P.O. Box 63900 (13808249)  
Cincinnati, OH 45263 (cr)

**Fifth Third Center**  
38 Fountain Square Plaza (13808250)  
MD 1-om-64 (cr)  
Cincinnati, OH 45263

**First Equity Card Corp**  
P.O. Box 23029 (13808251)  
Columbus, GA 31902-3029 (cr)

**First Equity Card Corp.**  
Account Inquiries (13808252)  
P.O. Box 84075 (cr)  
Columbus, GA 31901-4075

**Freeman Tire Corp**  
700 Gateway Dr (13808253)  
Bolingbrook, IL 60440 (cr)

**GM Card (HSBC)**  
P.O. Box 37281 (13808254)  
Baltimore, MD 21297-3281 (cr)

**Goodyear**

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200 Thorndale Avenue  
Bensenville, IL 60106

(13808255)  
(cr)

**Pomps**

PO Box 1630  
Green Bay, WI 54305-1630

(13808256)  
(cr)

**Tire Centers, LLC**

534 Territorial Dr  
Unit B  
Bolingbrook, IL 60440

(13808257)  
(cr)

**Tire Tracks**

18612 NW Frontage Rd  
Shorewood, IL 60404-9655

(13808258)  
(cr)

**US Auto Force**

425 S Washington St  
Combined Locks, WI 54113

(13808259)  
(cr)

IN THE MATTER OF: ) CHAPTER 11  
 )  
ANDY'S TIRE SHOP INC. ) JUDGE PAMELA HOLLIS  
 )  
DEBTOR. ) CASE NO. 09-14045

**MOTION FOR ENTRY OF FINAL DECREE**

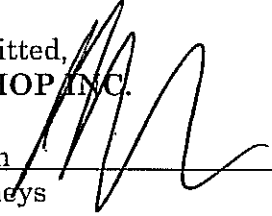
NOW COME the Debtor and Debtor in Possession, **ANDY'S TIRE SHOP INC.**, by their attorneys **PAUL M. BACH** of **BACH LAW OFFICES**, and ask this Honorable Court to enter a final decree. In support thereof, the Debtor and Debtor in Possession states as follows:

1. On April 21, 2009, the Debtors filed a Voluntary Petition For Relief, according to the provisions of Chapter 1 of the Code.
2. On March 18, 2010, this Court held a hearing and confirmed entered an Order pursuant to Section 1129 of the bankruptcy Code confirming the Debtors' Amended Plan of Reorganization.
3. Pursuant to the Confirmed Plan, Debtors' Payments to Class 1 creditors (administrative) are to be paid upon approval of the claims by the court. The claim of Paul M. Bach and Penelope N. Bach have not yet been approved, and, therefore, have not been paid.
4. Pursuant to the Confirmed Plan, Debtors' payments to Class 2 creditors (impaired unsecured non priority creditors) has begun, and, as this date has not been completed.
5. Pursuant to the Confirmed Plan, Debtors' payments to the Class 3 creditor (Fifth Third Bank-secured and not impaired) has continued and begun.
6. The plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.
7. Debtor's requests that this Court enter a final decree closing this Chapter 11 case. The final decree should expressly reserve jurisdiction in this Court for all pending matters, all final fee hearings, and those matters enumerated in Article VI of the Plan.

WHEREFORE, the debtors and debtors in possession, **ANDY'S TIRE SHOP INC.**,  
INC., asks this Honorable Court to enter an Final Decree closing this Chapter 11 case with an  
express reservation of jurisdiction and for such other relief as is just and equitable.

Respectfully submitted,  
**ANDY'S TIRE SHOP INC.**

BY: /s/ Paul M. Bach  
One of their attorneys



Paul M. Bach  
Bach Law Offices  
P.O. Box 1285  
Northbrook, Illinois 60065  
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